

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

TPC GROUP INC., et al.,

Debtors.¹

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

Re: D.I. 166

**CERTIFICATION OF COUNSEL REGARDING PROPOSED ORDER AUTHORIZING
THE FILING UNDER SEAL OF THE DIP FEES IN THE DEBTOR IN POSSESSION
FINANCING FACILITIES**

The undersigned counsel to the above-captioned debtors and debtors in possession (the “Debtors”), hereby certifies as follows regarding the proposed *Order Authorizing The Filing Under Seal Of The DIP Fees In The Debtor In Possession Financing Facilities* (the “Proposed Order”) attached hereto as **Exhibit A**:

1. On June 6, 2022, the Debtors filed the *Debtors’ Motion for Entry of an Order Authorizing the Filing Under Seal of the DIP Fees in the Debtor in Possession Financing Facilities* (D.I. 166) (the “Motion”).² Pursuant to the Notice of the Motion, the deadline to object to the Motion was June 20, 2022 at 4:00 p.m. (ET) (the “Objection Deadline”).

2. On June 17, 2022, the United States Trustee for the District of Delaware (the “U.S. Trustee”) filed the *United States Trustee’s Omnibus Objection to the Debtors’ Motions to Seal Filed at D.I. 164, 166 and 167* (D.I. 239). Beside the U.S. Trustee’s objection,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor’s corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

² Capitalized terms not defined herein are defined in the Motion.

the Debtors received no other objection, response, or comments to the Motion, and no objection or other responsive pleading to the Motion appears on the Court's docket.

3. To resolve the U.S. Trustee's objection, the Debtors filed the *Declaration of Zul Jamal in Support of Debtors' Motion for Entry of an Order Authorizing the Filing Under Seal of the DIP Fees in the Debtor in Possession Financing Facilities* (D.I. 536) (the "Declaration"). The U.S. Trustee has reviewed the Declaration and confirmed that the U.S. Trustee does not object to entry of the Proposed Order. For convenience of the Court and all parties in interest, the Proposed Order is attached hereto as **Exhibit A**.

WHEREFORE, the undersigned counsel respectfully requests on behalf of the Debtors that the Proposed Order be entered at the Court's earliest convenience.

[Signature page follows.]

Dated: July 28, 2022
Wilmington, Delaware

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